

May 9, 2001

Mike Kloska, CFO
Middlebury Hardwood Products, Incorporated
101 Joan Drive
P.O. Box 1429
Middlebury, Indiana 46540

Re: **039-12718**
First Significant Permit Modification to
Part 70 No.: T039-7669-00245

Dear Mr. Kloska:

Middlebury Hardwoods Products, Inc., was issued Part 70 operating permit T039-7669-00245 on September 23, 1999 for a stationary coating and wooden cabinet door manufacturing plant. An application to modify the permit was received on September 18, 2000. Since an appeal resolution requiring a permit modification was also agreed upon prior to this application, these two requests are combined in one document for efficiency. Pursuant to the provisions of 326 IAC 2-7-12, the significant permit modification for the following appeal resolution issue is hereby approved as described in the attached Technical Support Document:

Since actual conditions at the source do not allow for rooftop monitoring, the source has agreed to alternate monitoring.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for operation at the source:

- (a) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) a reciprocating machine (#2) that applies tinted sealer;
 - (B) a reciprocating machine (#15) that applies a sealer coat; and
 - (C) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and scrubber, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.

- (6) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.
- (7) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (b) One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

The construction approval letter for the above units was issued April 12, 2001.

The proposed operating conditions applicable to these emission units are attached to this Permit Modification approval. These proposed operating conditions are being incorporated into the Part 70 operating permit in conjunction with the appeal resolution as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-12. Please replace your current permit copy with this most recent version created as a result of this First Significant Permit Modification.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Melissa Groch or extension 3-8397, or dial (317) 233-8397.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality
Original Signed by Paul Dubenetzky

Attachments

MMG

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector- Ray Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Office of Legal Counsel- Aaron Schmoll

PART 70 OPERATING PERMIT

Office of Air Quality

Middlebury Hardwood Products, Inc.
58481 State Road 13
Middlebury, Indiana 46540-1429

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7669-00245	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 23, 1999

First Significant Permit Modification: 039-12718-00245	Pages affected: 3, 4, 5, 6, 23, 25-41
Original Signed By Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 9, 2001

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary coating and wooden cabinet door manufacturing plant.

Responsible Official: Lee Martin
Source Address: 58481 State Road 13, Middlebury, Indiana, 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana, 46540
Phone Number: 219/258-0778
SIC Code: 2499
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Six (6) paint booths, identified as E1 through E6, with one (1) HVLP spray gun and operator at each for wood furniture coating, with maximum capacities of 725 units per hour at spray booth E1, and 145 units per hour at spray booth E2 through E6, each using dry filters for overspray control and exhausting at their respective stacks, identified as E1 through E6.
- (b) Woodworking operations consisting of one (1) cyclone, identified as P5, for particulate control, with internal exhaust.
- (c) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) a reciprocating machine (#2) that applies tinted sealer;
 - (B) a reciprocating machine (#15) that applies a sealer coat; and
 - (C) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4,

exhausting to vents 8 and 9, respectively;

- (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (d) One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking facilities, identified as WW1, equipped with two (2) cyclone/baghouse systems, identified as P1 and P2, and two (2) baghouses, identified as P3 and P4, each for particulate control, with P3 and P4 exhausting internally, and P1 and P2 exhausting at their respective stacks, also identified as P1 and P2.

Surface Coating:

- (b) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
- (c) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested

records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

- (3) Whether compliance was based on continuous or intermittent data;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels

of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4 (c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously

with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to

reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all

such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in

writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2][326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**
Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 22, 1997. The plan consists of:
- Using a retractable transfer sleeve on the silo unloading conveyor to control fugitive dust.
- C.7 **Operation of Equipment [326 IAC 2-7-6(6)]**
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.8 **Stack Height [326 IAC 1-7]**
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- C.9 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All

demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test

date.

- (b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full

scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan- Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This

compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or

affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]:

- (a) Six (6) paint booths, identified as E1 through E6, with one (1) HVLP spray gun and operator at each for wood furniture coating, with maximum capacities of 725 units per hour at spray booth E1, and 145 units per hour at spray booth E2 through E6, each using dry filters for overspray control and exhausting at their respective stacks, identified as E1 through E6.
- (b) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (a) a reciprocating machine (#2) that applies tinted sealer;
 - (b) a reciprocating machine (#15) that applies a sealer coat; and
 - (c) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:
 - (a) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (b) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (c) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (d) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The surface coating facilities VOC input shall not exceed 20.74 tons, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) Pursuant to 326 IAC 2-2 (PSD), the source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The automated finishing line will be in compliance with this limitation by controlling PM emissions from coating overspray by dry filters and scrubbers.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the surface coating operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to CP-039-4959-00245, issued March 21, 1996, for booths E1 through E6, and 326 IAC 8-2-12 for all surface coating units, the surface coating applied to wood doors shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) Upon startup of the automated finishing line and pursuant to 40 CFR 63, Subpart JJ, the source is considered a new affected source and all of the wood furniture coating operations at the source shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to eight-tenths (0.8) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to two-tenths (0.2) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (b) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.1.1, D.1.2, and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Particulate Matter (PM)

Pursuant to CP-039-4959-00245, issued on March 21, 1996, the dry filters for PM control shall be in operation at all times when the surface coating booths, identified as E1 through E6, are in operation, and on the new automated finishing line, the dry filters and water curtain scrubbing system for PM control shall be in operation at all times this line is in operation.

D.1.12 Monitoring

- (a) For the surface coating operations, the Permittee shall implement an operator-training program.
 - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Parametric Monitoring

- (a) The Permittee shall visually check for gaps in the water curtain used in conjunction with the scrubbers for the automated finishing line, at least once per shift when in operation when venting to the atmosphere. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubber flow rate shall be maintained at 140 gallons per minute or more, or a range established for each during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal water flow operation compromises the cleanliness of the water and capture efficiency of the water curtain.
- (b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.14 Scrubber Inspections

An inspection shall be performed each calendar quarter of the water curtains and scrubbers controlling the automated finishing line.

D.1.15 Scrubber Failure

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.1.16 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance

with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.12, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventative Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (f) To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the inspections required under Condition D.1.14.

D.1.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
(2) July 1 through December 31.

The report shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS - Woodworking Operations

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]:

- (a) Woodworking operations consisting of one (1) cyclone, identified as P5, for particulate control, with internal exhaust.

Insignificant Activity [326 IAC 2-7-1(21)]:

- (b) Woodworking facilities, identified as WW1, equipped with two (2) cyclone/baghouse systems, identified as P1 and P2, and two (2) baghouses, identified as P3 and P4, each for particulate control, with P3 and P4 exhausting internally, and P1 and P2 exhausting at their respective stacks, also identified as P1 and P2.

Surface Coating:

- (c) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
- (d) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities, P1 and P2, shall not exceed 9.05 and 11.88 pounds per hour respectively, when operating at a process weight rate of 6,525 and 9,788 pounds per hour each, respectively. And for the sanding station baghouse, the allowable emission rate shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the woodworking facilities, P3 through P-5, each with maximum process weight rates less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.
- (c) The requirement from CP 039-4959-00245, issued March 21, 1996, Operation Condition 3(b), that establishes a 41.95 pound per hour PM allowable rate is not applicable because the pounds per hour throughput reported in the Part 70 application for P1 through P5 list different throughputs for each.

D.2.2 Baghouse Limitations [326 IAC 2-7(21)(G)(xxx)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic feet of outlet air.
- (b) Pursuant to CP 039-4959-00245, issued on March 21, 1996, visible emissions from the baghouses (P1through P4) shall not exceed 10% opacity.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

- (a) Pursuant to CP-039-4959-00245, issued on March 21, 1996, the baghouses (P1 through P4) for PM control shall be in operation at all times when their associated woodworking facilities are in operation.
- (b) The cyclone, P5, for PM control shall be in operation at all times when its associated woodworking facilities are in operation.

D.2.6 Visible Emissions [326 IAC 2-7-1(21)(G)(xxx)]

Visible Emissions from each baghouse, P1 through P4, shall be observed daily using procedures in accordance with Method 22, recording normal or abnormal emissions. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (a) The baghouses shall be inspected.
- (b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.2.7 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxx)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone stack exhaust P5 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.9 Broken or Failed Bag or Cyclone Failure Detection

- (a) In the event that bag failure has been observed for any baghouse:

- (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) In the event that cyclone failure has been observed:
 - Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (c) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of daily visible emission notations of the particulate control equipment (P1through P5) stacks' exhaust.
- (b) To document compliance with Conditions D.2.6 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.7, and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS -Boiler

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to 326 IAC 2-2 (PSD), the source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The boiler will be in compliance with this limitation by controlling PM emissions with a cyclone.
- (b) Pursuant to 326 IAC 2-2 (PSD), the source will limit VOC emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable.

D.3.2 Particulate Matter Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from boiler EU-8 shall be limited to 0.51 pounds of PM emitted per million Btu heat input as shown by the following equation, when Q equals 19.13 MMBtu per hour:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where P_t = pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input; and
 Q = total source maximum operating capacity rating in million Btu per hour (mmBtu/hr).

D.3.3 Fuel Usage

The boiler, identified as EU-8, shall use only wood as fuel.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.5 Particulate Matter (PM)

In order to comply with D.3.1, the cyclone for PM control shall be in operation and control emissions from the boiler at all times this unit is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been

trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the boiler when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units), records for the boiler shall be maintained of the amount of fuel combusted during each day. All records shall be maintained for a period of two years.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 58481 State Road 13, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-7669-00245

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**Office of Air Quality
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 58481 State Road 13, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-7669-00245

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- | | |
|------|--|
| 9 1. | This is an emergency as defined in 326 IAC 2-7-1(12)
<input checked="" type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
<input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 2. | This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
<input checked="" type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 58481 State Road 13, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-7669-00245
Facility: Surface Coating
Parameter: VOC input
Limit: 20.74 tons of VOC input, including coatings, dilution solvents, and cleaning solvents, per month

QUARTER/ YEAR: _____

Month	Tons per Month

Year End Total in Tons per Year (*to be reported with 4th Quarter*) : _____

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 58481 State Road 13, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-7669-00245
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit: Finishing operations- 0.8 lb VHAP/lb Solids, weighted average VHAP content across all coatings, as applied
Finishing operations stains- 1.0 lb VHAP/lb Solids, as applied
Finishing operations washcoats, sealers, topcoats, basecoats, and enamels- 0.8 lb VHAP/lb Solids, as applied
Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
All other thinner mixtures - 10% VHAP content by weight
Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids
All other contact adhesives - 0.2 lb VHAP/lb Solids
Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP / lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP / lb Solid)	Contact adhesives (lb VHAP / lb Solid)	Strippable spray booth material (lb VOC / lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 58481 State Road 13, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-7669-00245

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document for a Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit

Source Name: Middlebury Hardwood Products, Inc.
Source Location: 58481 State Road 13, Middlebury, Indiana, 46540-1429
County: Elkhart County
SIC Code: 2499
Operation Permit No.: T 039-7669-00245, issued September 23, 1999
Modification No.: 039-12718-00245
Permit Reviewer: Melissa Groch

On February 8, 2001, the Office of Air Quality (OAQ) had a notice published in The Elkhart Truth, in Elkhart, Indiana, stating that Middlebury Hardwood Products, Incorporated, had applied for a Part 70 Operating Permit to modify a stationary coating and wooden cabinet door manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

During the public notice, the source stated their intentions had changed regarding the future removal of all spray coating booths originally permitted. After the 30 day comment period, they determined that they would be keeping these original booths to use for situations when the new automatic system would be shut down for maintenance or emergency repairs. Also, the EPA commented on April 12, 2001, resulting in further revisions. As a result of these issues, some of the conditions in the draft permit have been modified or deleted. All changes and their reasons are noted below.

1. Since the review procedures for the construction of the new automated finishing line have been fulfilled, the construction approval portion of this review has been issued. The construction approval letter for the significant source modification was issued on April 12, 2001 (See Appendix A of this document). The operation approval letter for the significant permit modification portion of this review is being issued with this TSD Addendum document, accordingly.

Also, the operation approval letter notes the date of issuance for the construction approval letter, and does not restate the construction conditions. The operation approval letter also states that the entire permit has been updated to incorporate the changes listed in this document.

2. The source has decided to keep the original spray booths, instead of dismantling them after operation of the new line. As commented by the EPA, the more stringent requirements of the wood furniture NESHAP, 40 CFR 63, Subpart JJ, for new affected sources will be applicable to all surface coating at the source. The previous less stringent NESHAP requirements issued in the source's initial Title V operating permit, on September 23, 1999, will be replaced with the new requirements already listed in condition D.1.6. This change is based on the determination that the new automated finishing line will qualify as reconstruction and not a modification, even though the source will be keeping the original spray booths. Therefore, condition D.1.6, parts (a) and (b), will have the changes shown below:

D.1.65 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) ~~Upon dismantlement of the surface coating operation, booths E1 through E6, the wood furniture coating operation automated finishing line will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date upon startup for new affected sources.~~
- (b) Upon startup of the automated finishing line and pursuant to 40 CFR 63, Subpart JJ, **the source is considered a new affected source and all of the wood furniture coating operations at the source** shall comply with the following conditions:

Since the initial less stringent limits of condition D.1.5 are no longer applicable after startup of the new line, the language has been deleted. The Table of Contents has been changed and all subsequent conditions have been renumbered accordingly as a result. Please note that the more stringent NESHAP requirements, listed now as D.1.5, apply to all of the source's surface coating facilities upon startup of the new automated finishing line.

3. Because one of the NESHAPs conditions has been deleted, the second sentence of part (b) reads as it

originally did in condition D.1.9, which is now D.1.8. It reads as:

If testing is required by IDEM, compliance with the limits specified in Condition D.1.1, D.1.2, ~~D.1.6~~ and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

4. Also, condition D.1.10, now D.1.9, has the following change in the first sentence:

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, ~~D.1.6~~ and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

5. To resolve an appeal, the source agreed to alternate monitoring. However, in order for this condition to be consistent with other sources who wish to monitor by implementing an operator-training program, and to further clarify the requirements, the following has been added to condition D.1.13, now D.1.12, part (a)(2):

The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.

6. To clarify the last sentence of condition D.1.14, now D.1.13, part (a), it has been revised to read as:

The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when ~~the pressure reading is outside of the above mentioned range for any one reading~~ **abnormal water flow operation compromises the cleanliness of the water and the capture efficiency of the water curtain.**

Also, part (b) inadvertently referred to OAM instead of OAQ. This has been changed to OAQ, accordingly.

7. Since the scrubbers should never be vented inside, the second sentence of condition D.1.15, now D.1.14, is not necessary and has been deleted as shown below:

~~Inspections are optional when venting to the indoors.~~

8. The record keeping condition, now listed as D.1.16, has several revisions. Part (b) has been revised since a previous condition has been deleted. It now reads as:

To document compliance with Conditions D.1.5 ~~and D.1.6~~, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Conditions D.1.5 ~~and D.1.6~~.

Part (c) of this same condition, will read as it did in the original permit:

To document compliance with Condition D.1.7 ~~6~~, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

The condition reference in the first sentence of part (d) has been changed as follows:

To document compliance with Condition D.1.13 ~~2~~, the training program shall be written and retained on site.

And again, since a previous condition has been deleted, part (f) will read as:

To document compliance with Condition D.1.15 ~~4~~, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15 ~~4~~.

9. Parts (b) and (c) of the reporting condition, now listed as D.1.17, have been deleted since the source will be keeping the original spray booths. They read as:

~~(b) To document compliance with condition D.1.1, the Permittee shall submit a written notification to the OAQ, Air Compliance Section of the date of construction for the automated finishing line. The Permittee shall also submit a written notification to the Air Compliance Section documenting the start of operation of this line within one (1) week after start of operation. If after six (6) months since the start of operation date, the automated finishing line is not fully operable, and the existing line (E1 through E6) is not offline and dismantled, the Permittee shall notify the OAQ, Air Compliance Section, to request a six (6) month extension. Further extensions may be granted at the discretion of the Air Compliance Section.~~

- ~~(c) — An Initial Compliance Report to document compliance with Condition D.1.6, and the Certification form, shall be submitted to the address listed in Section C — General Reporting Requirements, of this permit, within one hundred and twenty (120) calendar days following startup of the automated finishing line. The initial compliance report must include data from the entire month that the compliance date falls.~~

Also, part (d) of this condition has been revised, and is now listed as (b). And since part (e) is no longer necessary, it has been combined into part (b) as follows:

- ~~(d b)~~ A semi-annual Continuous Compliance Report to document compliance with Conditions D.1.5 and ~~D.1.6~~, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The reports ~~required in (b) and (e) of this condition~~ shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The original NESHAP reporting form for the 6 spray booths has been updated to the more stringent limits that will be applicable once the new line is operating. This revised reporting form will be used for all surface coating facilities at the source.

10. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Therefore, since the source will be keeping the original spray booths, the potential to emit calculations from the initial permit will still be valid.

For clarification, in the Technical Support Document, under the section titled Justification for Modification, it was noted that the original spray booths would be dismantled at later date. However, the source has decided they will not be removing these. The new automated finishing line has been reevaluated and is still considered as a reconstruction. Even though the source will keep the original spray booths, the source will still be considered as a new affected source for the purposes of the woodworking NESHAP. Once the new line is constructed, and operation begins, the more stringent requirements of the NESHAP will apply to the source.

Also, it was stated there will be an overall decrease in emissions from the coating line. By keeping the original spray booths, it appears they will not have a decrease. However, the source stated they plan to use the original spray booths only in maintenance and emergency situations when they cannot use the automated line. In all situations, the source will still be required to stay below the enforceable limits listed in their operating permit. Any decrease in emissions may be more apparent after yearly data is gathered for actual emissions from the source after the new line is fully operational.

Also, under the section for Federal Rule Applicability in the TSD, it was stated that the new automated finishing line is considered a new affected source upon startup. That is still the case, even though this was the determination based on the original spray booths being dismantled. Again, although the source will be keeping the original spray booths, the new line is still being considered a reconstruction, and the source is therefore viewed as a new affected source under the woodworking NESHAP.

Mike Kloska, CFO
Middlebury Hardwood Products, Incorporated
101 Joan Drive
P.O. Box 1429
Middlebury, Indiana 46540

Re: **039-12718**
Significant Source Modification to Part 70 permit No.: T039-7669-00245

Dear Mr. Kloska:

Middlebury Hardwoods Products, Inc., was issued Part 70 operating permit T039-7669-00245 on September 23, 1999 for a stationary coating and wooden cabinet door manufacturing plant. An application to modify the source was received on September 18, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) a reciprocating machine (#2) that applies tinted sealer;
 - (B) a reciprocating machine (#15) that applies a sealer coat; and
 - (C) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and scrubber, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
 - (6) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.
 - (7) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:

- (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (b) One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to the final issuance of the source's Part 70 Operating Permit revision done at the same time to incorporate the required operation conditions.

The operating conditions applicable to these emission units shall be incorporated into the Part 70 operating permit in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Melissa Groch or extension 3-8397, or dial (317) 233-8397.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

MMG/ILC

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector- Ray Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

April 12, 2001

Mike Kloska, CFO
Middlebury Hardwood Products, Incorporated
101 Joan Drive
P.O. Box 1429
Middlebury, Indiana 46540

Re: **039-12718**
Significant Source Modification to Part 70 permit No.:
T039-7669-00245

Dear Mr. Kloska:

Middlebury Hardwoods Products, Inc., was issued Part 70 operating permit T039-7669-00245 on September 23, 1999 for a stationary coating and wooden cabinet door manufacturing plant. An application to modify the source was received on September 18, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) a reciprocating machine (#2) that applies tinted sealer;
 - (B) a reciprocating machine (#15) that applies a sealer coat; and
 - (C) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and scrubber, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
 - (6) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.
 - (7) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:

- (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (b) One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

The following construction conditions are applicable to the proposed project:

- General Construction Conditions
1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
 2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- Effective Date of the Permit
- Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
 6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to the final issuance of the source's Part 70 Operating Permit revision done at the same time to incorporate the required operation conditions.

The operating conditions applicable to these emission units shall be incorporated into the Part 70 operating permit in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Melissa Groch or extension 3-8397, or dial (317) 233-8397.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality
Original Signed by Paul Dubenetzky

MMG/ILC

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector- Ray Schick
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Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Significant Permit Modification

Source Background and Description

Source Name: Middlebury Hardwood Products, Inc.
Source Location: 58481 State Road 13, Middlebury, Indiana, 46540-1429
County: Elkhart County
SIC Code: 2499
Operation Permit No.: T 039-7669-00245, issued September 23, 1999
Modification No.: 039-12718-00245
Permit Reviewer: Melissa Groch

The Office of Air Quality (OAQ) has reviewed a modification application from Middlebury Hardwood Products, Inc., relating to the construction and operation of the following emission units and pollution control devices:

- (a) An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) a reciprocating machine (#2) that applies tinted sealer;
 - (B) a reciprocating machine (#15) that applies a sealer coat; and
 - (C) a reciprocating machine (#21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
 - (5) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
 - (6) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.
 - (7) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and

- (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (b) One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.
- (c) One (1) two lane gravel drive, identified as unit 21, with fugitive PM emissions rated at 200 pounds per year.

Appeal Resolution

In addition to the above, the Office of Air Quality (OAQ) has also reviewed a petition for administrative review and request for stay of effectiveness received on October 25, 1999 relating to the following appeal resolution:

The permit condition requiring rooftop monitoring has been replaced with an alternate condition.

History

On October 25, 1999, this source petitioned the OAQ for administrative review and stay of effectiveness. The resolution of this appeal is included in this document as requested by the source.

On September 18, 2000, Middlebury Hardwood Products, Inc., submitted an application to the OAQ requesting to replace their existing surface coating facilities at their plant with a new automated finishing line. Middlebury Hardwood Products, Inc., was issued a Part 70 permit on September 23, 1999.

Air Pollution Control Justification as an Integral Part of the Process

- (a) The company has submitted the following justification such that the spray machine enclosures be considered as an integral part of the automated finishing line process:
 - (1) The primary purpose of the enclosed spray machine is to recover coating and solvent material from the belt conveyors for reuse. In order to capture overspray for the recovery, each spray area must be enclosed to ensure the maximum amount of overspray is captured.
 - (2) Because of solvent/coating buildup issues, the enclosures on the spray machines are required by the manufacturer to be intact at all times the process is running so that the equipment runs properly and the product standard is achieved. If the enclosure is leaking coating material, the integrity of the recovery system is compromised and the operation must be stopped for repairs. A leaking system means that coating material is being wasted which defeats the purpose of installing the recovery system altogether.
 - (3) As a benefit, each enclosure also serves to protect the sensitive electronic components that spray the coating onto the substrate, as well as control the air flow in the spray area.
- (b) The company has submitted the following justification such that the baghouse/cyclone system controlling PM from the automated finishing line sanding areas be considered as an integral part of the automated finishing line process:
 - (1) The dust from the sanding areas of the new automated finishing line must be removed from the substrate so that the coating quality is not compromised.
 - (2) If the baghouse/cyclone system is not working properly, the product finish will not be up to standard resulting in wasted coating material, substrate, and labor, which all result in less profit.

IDEM, OAQ has evaluated the justifications and determined that the above PM emission controls outlined above will be considered as an integral part of the new automated finishing line process. Therefore, the PM emissions from these are determined using the potential to emit after the integral components, and compliance monitoring for the baghouse/cyclone system, spray enclosures, and the coating recovery system will not be necessary.

Also, the automated finishing line will have dry filters on unit 9, and water curtain scrubbers associated with units 2, 9, 15 and 21 which will not be considered integral because they are being installed to control overspray PM

exhausting to the atmosphere.

Enforcement Issue

The source has the following enforcement actions pending:

During a compliance inspection conducted on September 19, 2000, it was discovered that the source failed to keep the required inspection records pursuant to 326 IAC 20. This case is currently under review by the IDEM, Office of Enforcement. The source wishes to qualify the new automated finishing line as a supplemental environmental project.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
7	tinted sealer spray machine, unit 2	25	24	12,000	ambient
8	tinted sealer flash off oven, unit 3	25	31	3,000	110
9	tinted sealer curing oven, unit 4	25	10	2,000	110
10	stain spray machine, unit 9	25	24	10,000	ambient
11	stain brush machine, unit 10	25	14	7,000	ambient
n/a	hand wiping manual station, unit 11	n/a	n/a	n/a	n/a
12	sanding stations, units 05, 8, and 18	25	10	5,000	ambient
13	stain drying machine, unit 12	25	10	2,000	110
14	sealer coat spray machine, unit 15	25	24	12,000	ambient
15	sealer coat flash off oven, unit 16	25	31	3,000	110
16	sealer coat curing oven, unit 17	25	10	2,000	110
17	top coat spray machine, unit 21	25	24	12,000	ambient
18	top coat flash off oven, unit 22	25	31	3,000	110
19	top coat curing oven, unit 23	25	10	2,000	110
20	wood-fired boiler, unit EU-8	28	31	37,000	336

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 18, 2000. Additional information was received on November 27, 2000, and on December 19, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 to 4 of 4.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification and a Significant Permit Modification. This source modification and permit modification is being performed pursuant to 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-12, respectively. Initially, the significant permit modification for the appeal resolution was being performed. Since the source has also applied for a significant source modification, which also is required to go through a public notice comment period, one document for both is being created. The source wishes to operate both spray lines (existing and new) under the current applicable requirements and existing permit conditions until the new system is fully operational and reliable. The new equipment will cause a potential increase in PM emissions overall from the entire source which are more than the thresholds listed in 326 IAC 2-7-10.5(f)(4)(A). Therefore, this source modification is reviewed as a significant source modification.

After the existing coating line is dismantled, the source will have an overall decrease in the VOC and PM potential

emissions from the surface coating operation, because the new automated finishing line has programmable equipment to spray more efficiently and evenly, and the line reuses/recycles coating material accumulating from overspray. This results in less use of coating material altogether, and allows for a higher throughput on the line.

Upon the dismantlement of the existing line when the new line is fully operational, this modification under 40 CFR 63 Subpart JJ will be considered a reconstruction. Therefore, pursuant to 63.802(b) of this subpart, the new automated finishing line will be considered a new affected source and subject to the more stringent limits of Subpart JJ. The control device on the new line will not be used to comply with the provisions of this subpart.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Automated Finishing Line	Baghouse/Cyclone System	Boiler	Modification Potential To Emit (tons/year)
PM	26.26 (after controls)	0.001 (after controls)	48.5	74.76
PM-10	26.26 (after controls)	0.001 (after controls)	48.5	74.76
SO ₂	0	0	0.8	0.8
VOC	255.61	0	1.0	256.61
CO	0	0	36.4	36.4
NO _x	0	0	9.9	9.9

HAP's from Automated Finishing Line	
Xylene	greater than 10
Methanol	greater than 10
TOTAL	single HAP greater than 10

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Elkhart County has been designated as maintenance attainment for ozone. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation

per year at rated capacity and/or as otherwise limited):

Pollutant	Potential to Emit (tons/year)	
	Existing Source	Proposed Modification
PM	63.19	less than 250
PM-10	63.19	less than 250
SO ₂	n/a	0.8
VOC	less than 250	less than 250
CO	n/a	36.4
NO _x	n/a	9.9
Single HAP	200.63	22.72
Combination of HAPs	218.18	57.98

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon information contained in TV 039-7669-00245, and in the calculations in Appendix A of this document.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Before Modification	63.19	63.19	-	less than 250	-	-	218.8
Proposed Modification	less than 250	less than 250	0.8	less than 250	36.4	9.9	57.98
PSD or Offset Threshold level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) The new wood-fired boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it is rated at a heat input capacity greater than 10 mmBtu per hour, but less than 100 mmBtu per hour. Since it is fueled only by wood, only the reporting and recordkeeping requirements of this subpart apply under 60.48c. Also, because the boiler is rated at less than 30 mmBtu per hour of heat input, 60.43c(c) does not apply.
- (b) The new automated finishing line is considered a new affected source upon startup, and therefore subject to the more stringent limits of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart JJ) because it is determined to be a reconstructed source under 63.802(b) and 63.2.

State Rule Applicability - Entire Source

326 IAC 2-2 (Minor Source PSD Limit)

Pursuant to 326 IAC 2-2 (PSD), the source will limit VOC and PM emissions to less than 250 tons per year and will

render 326 IAC 2-2 (PSD) not applicable.

State Rule Applicability - Individual Facilities

New Automated Finishing Line

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the automated finishing line shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The automated finishing line spray station controls for PM control shall be in operation at all times this process is in operation, in order to comply with this limit.

Baghouse/Cyclone

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the new baghouse/cyclone system shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Boiler

326 IAC 6-2-4 (Particulate Matter Limitation (PM))

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from boiler EU-8 shall be limited to 0.51 pounds of PM emitted per million Btu heat input as shown by the following equation, when Q equals 19.13 MMBtu per hour:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where } Pt = \text{pounds of particulate matter emitted per million Btu} \\ \text{(lb/mmBtu) heat input; and} \\ Q = \text{total source maximum operating capacity rating in million} \\ \text{Btu per hour (mmBtu/hr).}$$

Since the PM potential emission rate of 11.07 pounds per hour (equal to 48.5 tons per year) from boiler EU8 is more than the allowable limit of 9.76 pounds per hour, the cyclone (with an efficiency of 87%) must be operating at all times boiler EU8 is in operation. After controls, the PM potential emission rate of 1.44 pounds per hour from boiler EU8 is less than allowable limit of 9.76 pounds per hour. Therefore, this boiler shows compliance with 326 IAC 6-2-4.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these

conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. Since the baghouse/cyclone system controlling the dust from the new automated finishing line is considered integral to the process, no compliance monitoring is required.
2. Since the spray area enclosures and coating recovery systems are considered integral to the process, no compliance monitoring is required.
3. The scrubbers for PM overspray control on spray units 2, 9, 15, and 21, and dry filters on unit 9, are subject to the following:
 - (a) For the dry filters on unit 9, the Permittee shall implement an operator-training program.
 - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
 - (3) All operators shall be given refresher training annually.
 - (b) For the spray area water curtain and scrubbers, the Permittee shall:
 - (1) Visually check for gaps in the water curtain used in conjunction with the scrubbers for the automated finishing line, at least once per shift when in operation when venting to the atmosphere. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubber flow rate shall be maintained at 140 gallons per minute or more, or a range established for each during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (2) Perform an inspection each calendar quarter of the water curtains and scrubbers controlling the automated finishing line. Inspections are optional when venting to the indoors.
 - (3) In the event that scrubber failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
4. The boiler is subject to the following:
 - (a) An inspection shall be performed each calendar quarter of the cyclone controlling the boiler when venting to the atmosphere. A cyclone inspection shall be performed within three months of

redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

- (b) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Daily visible emissions notations of the boiler stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the overspray controls for the spray stations, and the cyclone for the wood-fired boiler must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Permit Modifications Resulting from New Equipment (Significant Source Modification) and Resolution of the Appeal (Significant Permit Modification)

The following changes have been incorporated into the Part 70 operating permit (strikeout indicates deleted language, and new language is bolded).

- 1. To show that the original permit has been modified, a box has been added to the cover page of the permit as shown below:

First Significant Permit Modification: 039-12718-00245	Pages affected: 3, 4, 5, 6, 23, 25-43
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

- 2. The surface coating equipment for the new automated finishing line has been added to condition A.2(c) and the Section D.1 description box as follows:

An automated finishing coating machine with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour coated, consisting of the following manufacturing stages:

- (1) **Three (3) spray machines identified as units 2, 15, and 21, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:**
 - (A) **a reciprocating machine (#2) that applies tinted sealer;**
 - (B) **a reciprocating machine (#15) that applies a sealer coat; and**
 - (C) **a reciprocating machine (#21) that applies the top coat.**
- (2) **One (1) rotary spray machine for stain application identified as unit 9, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.**
- (3) **One (1) brush wiping machine, identified as unit 10, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.**

- (4) One (1) manual wiping station, identified as unit 11, manually operated as necessary with no exhaust.
- (5) Seven (7) ovens used at various points on the process line, with each oven indirectly heated by boiler EU-8. These are as listed:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, exhausting to vents 8 and 9, respectively;
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively; and
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.

The new boiler has been added as part (d). This part reads as:

One wood-fired boiler identified as EU-8, with a maximum capacity of 19.13 MMBtu per hour, with PM emissions controlled by a cyclone fly ash collector with an efficiency rated at 87%, exhausting to stack 20.

The new woodworking stations on the finishing line are insignificant activities and are added to condition A.3. As a result, the original woodworking will become part (a), and the new equipment will be listed as part (b) and (c). They read as follows:

Surface Coating:

- (b) Three (3) sanding stations identified as units 5, 8, and 18, with PM emissions controlled by a cyclone in series with one (1) baghouse that exhausts to vent 12.
- (c) One (1) hand sanding station identified as unit 19, for the sanding of parts after the sealer coat has been applied, exhausting internally.

3. Because Section D.2 has new equipment added, condition D.2.1(a) has been changed to read as:

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities, P1 and P2, shall not exceed 9.05 and 11.88 pounds per hour respectively, when operating at a process weight rate of 6,525 and 9,788 pounds per hour each, respectively. **And for the sanding station baghouse, the allowable emission rate shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour.** The pounds per hour limitation was calculated with the following equation:

4. Also, the addition of the new boiler will require a new D section to be created. This new section will be D.3, and the description box will contain the boiler description listed in item 2 and the following new conditions:

D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to 326 IAC 2-2 (PSD), the source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The boiler will be in compliance with this limitation by controlling PM emissions with a cyclone.
- (b) Pursuant to 326 IAC 2-2 (PSD), the source will limit VOC emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable.

D.3.2 Particulate Matter Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from boiler EU-8 shall be limited to 0.51 pounds of PM emitted per million Btu heat input as shown by the following equation, when Q equals 19.13 MMBtu per hour:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where} \quad Pt = \begin{array}{l} \text{pounds of particulate matter emitted per million Btu} \\ \text{(lb/mmBtu) heat input; and} \\ Q = \text{total source maximum operating capacity rating in million} \\ \text{Btu per hour (mmBtu/hr).} \end{array}$$

D.3.3 Fuel Usage

The boiler, identified as EU-8, shall use only wood as fuel.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.5 Particulate Matter (PM)

In order to comply with D.3.1, the cyclone for PM control shall be in operation and control emissions from the boiler at all times this unit is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the boiler when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units), records for the boiler shall be maintained of the amount of fuel combusted during each day. All records shall be maintained for a period of two years.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6 and the dates the vents are

redirected.

- (d) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Also, the Table of Contents has been changed to reflect the addition of this new Section.

5. Since the source has requested to incorporate their new automated finishing line under their existing permit limit for VOC. Since they are also adding a boiler which has a VOC potential to emit of 1 tons per year, the surface coating limit has been decreased slightly. This lower limit provides for these extra VOC emissions from the boiler. This change also makes a previous enforceable construction permit condition no longer applicable as shown below in strikeout. A quarterly reporting form for the surface coating has also been revised as a result. Part (a) of condition D.1.1 now reads as follows:

~~Pursuant to CP-039-4959-00245, issued on March 21, 1996, T~~ The surface coating facility ~~y ies~~, shall not exceed 20.754 tons of VOC input, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

For clarification, and because the new line and existing line have significant PM emissions, the following has been added as part (b):

Pursuant to 326 IAC 2-2 (PSD), the source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The automated finishing line will be in compliance with this limitation by controlling PM emissions from coating overspray by dry filters and scrubbers.

6. Condition D.1.3 has been revised to include the new automated finishing line as follows:

Pursuant to CP-039-4959-00245, issued March 21, 1996, **for booths E1 through E6**, and 326 IAC 8-2-12 **for all surface coating units**, the surface coating applied to wood doors ~~in booths E1 through E6~~ shall utilize one of the following application methods:

7. When the new automated finishing line becomes fully operational, and the existing line has been dismantled, the source will become subject to more stringent limits pursuant to 40 CFR 63, Subpart JJ, 63.802(b). Therefore the following condition has been added as D.1.6:

Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) Upon dismantlement of the surface coating operation, booths E1 through E6, the wood furniture coating operation automated finishing line will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date upon startup for new affected sources.
- (b) Upon startup of the automated finishing line and pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) **Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:**
- (A) **Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or**
- (B) **Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or**
- (C) **Use a control device to limit emissions to eight-tenths (0.8) pound VHAP per pound solids; or**
- (D) **Use a combination of (A), (B), and (C).**

(2) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
- (C) Use a control device to limit emissions to two-tenths (0.2) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

As a result of this new condition, all subsequent conditions in this section are renumbered accordingly, and the Table of Contents has been changed.

- 8 To incorporate the new condition listed as D.1.6, the second sentence of part (b) of the Testing Requirements condition, now listed as D.1.9, has the following changes:

If testing is required by IDEM, compliance with the limits specified in Condition D.1.1, D.1.2, **D.1.6** and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

9. Since there is a new D.1.6 condition regarding the new line, the first sentence of condition D.1.10 now reads as:

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, **D.1.6** and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

10. Because the new automated finishing line is required to operate the control equipment at all times, the following has been added to condition D.1.12, previously listed as D.1.11, as follows.

Pursuant to CP-039-4959-00245, issued March 21, 1996, the dry filters for PM control shall be in operation at all times when the surface coating booths, identified as E1 through E6, are in operation ;, **and on the new automated finishing line, the dry filters and water curtain scrubbing system for PM control shall be in operation at all times this line is in operation.**

11. Since there is a new D.1.6 condition regarding the new line, the first two sentences of the record keeping condition, now listed as condition D.1.17, part (b) now read as:

To document compliance with Conditions D.1.5 **and D.1.6**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Conditions **D.1.5 and D.1.6**.

And part (c) reads as:

To document compliance with Condition D.1.6 **7**, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

12. Because the source is replacing the original surface coating line with more complex equipment, they are requesting that the existing line remain on line and operable during the testing of the new line since this is the primary activity at the source and because it is not feasible or logical to shut the company down for any length of time. As a result, a new part (b) has been added to the reporting condition now listed as D.1.18 as follows:

To document compliance with condition D.1.1, the Permittee shall submit a written notification to the OAQ, Air Compliance Section of the date of construction for the automated finishing line. The Permittee shall also submit a written notification to the Air Compliance Section documenting the start of operation of this line within one

(1) week after start of operation. If after six (6) months since the start of operation date, the automated finishing line is not fully operable, and the existing line (E1 through E6) is not offline and dismantled, the Permittee shall notify the OAQ, Air Compliance Section, to request a six (6) month extension. Further extensions may be granted at the discretion of the Air Compliance Section.

All subsequent parts in this condition have been re-lettered accordingly, and since the new line will be subject to more stringent limits under 40 CFR Subpart JJ, another initial compliance report must be submitted. This results in changes to part (c), previously listed as (b), as follows:

An Initial Compliance Report to document compliance with Condition D.1.5 **6**, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within ~~sixty (60)~~ **one hundred and twenty (120)** calendar days following ~~the compliance date of November 21, 1997~~ **startup of the automated finishing line**. The initial compliance report must include data from the entire month that the compliance date falls.

And, the first sentence of part (d), previously listed as (c), reads as:

A semi-annual Continuous Compliance Report to document compliance with Conditions D.1.5 **and D.1.6**, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

Because of the above change, an additional reporting form has been added to the permit, and noted in the Table of Contents.

13. Since the automated finishing line has scrubbers associated with the spray areas, the following conditions have been added to Section D.1:

D.1.14 Parametric Monitoring

- (a) **The Permittee shall visually check for gaps in the water curtain used in conjunction with the scrubbers for the automated finishing line, at least once per shift when in operation when venting to the atmosphere. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubber flow rate shall be maintained at 140 gallons per minute or more, or a range established for each during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.**
- (b) **The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.**

D.1.15 Scrubber Inspections

An inspection shall be performed each calendar quarter of the water curtain and scrubbers controlling the automated finishing line. Inspections are optional when venting to the indoors.

D.1.16 Scrubber Failure

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

All subsequent conditions have been renumbered and the Table of Contents has been changed. Because of these new conditions, a new part (f) has been added to Record Keeping Requirements, now listed as D.1.17. It reads as:

To document compliance with Condition D.1.15, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15.

The changes to the permit resulting from the appeal resolution are as follows:

14. The source requested that Condition D.1.12, now D.1.13, be removed or modified to accommodate actual conditions at the source regarding rooftop monitoring. Therefore, as an agreement between the IDEM and the source, they have opted to replace the entire condition with a new condition under Compliance Determination. This alternate condition reads as follows:

D.1.13 Monitoring

- (a) **For the surface coating operations, the Permittee shall implement an operator-training program.**
- (1) **All operators that perform painting operations or booth/line maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**
- (2) **Training shall include proper filter alignment, filter/scrubber inspection and maintenance, and troubleshooting practices.**
- (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

The previous condition was listed under Compliance Monitoring as D.1.12, and read as:

~~D.1.12 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1 through E6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

15. Because the original condition has been deleted and replaced with new language, it was necessary to revise part (d) of the record keeping condition, now listed as D.1.17, as follows:

To document compliance with Condition D.1.12 3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and these training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventative Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.

Additional Changes made at IDEM's discretion are:

16. The Particulate Matter condition, D.1.11, now D.1.12, had been mistakenly listed under the Compliance Monitoring Requirements portion of Section D.1 in the original Title V. Because this condition was previously listed in a federally enforceable construction permit for the surface coating booths as a means to determine compliance, it should have been listed under the Compliance Determination Requirements. Therefore, this condition has been moved from Compliance Monitoring Requirements to Compliance Determination Requirements. Since no other conditions remain under Compliance Monitoring for this section, it has been removed from Section D.1. As a result, the Table of Contents has also been changed to reflect this.

17. A decision to change reporting frequency for all sources required to submit the Compliance Monitoring Report Form has been changed from quarterly to semi-annual. Therefore, the two references to "quarterly" on this form have been changed accordingly, and Condition C.23, part (a) has been changed to read as:

To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a **Semi-Annual** ~~Quarterly~~ Compliance Monitoring Report.

18. All permit references to the Office of Air Management and OAM have been changed to the Office of Air Quality and OAQ, respectively, since the IDEM has recently changed the name of this office.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-12718-00245.

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Reviewer: Melissa Groch

HVLP

HVLP

air assisted airless

HVLP

air assisted airless

58.36	1400.59	255.61	26.26
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Percent of Sprayed Coating Recovered:	38%
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Percent of Sprayed Coating Recovered:	38%
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surcoat.wb3

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Middlebury Hardwoods Inc.
Address City IN Zip: 58481 State Road 13, Middlebury, Indiana 46540-1429
Permit: 039-12718-00245
Review: Melissa Groch

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Cumene	Weight % Formald.	Weight % Ethyl Benzene	Weight % Methyl Phenyl	Weight % Methanol	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Formald. Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Phenyl Emissions (ton/yr)	Methanol Emissions (ton/yr)
Unit 2															
Tinted Pre	7.69	0.0035	1050	0.00%	0.00%	0.00%	0.00%	6.100%	0.00%	0.00	0.00	0.00	0.00	7.55	0.00
Tinted Pre	7.69	0.0035	1050	0.00%	0.00%	1.00%	0.00%	0.0000%	0.00%	0.00	0.00	1.24	0.00	0.00	0.00
Unit 9															
711 Stain	7.26	0.0020	1050	2.00%	1.00%	0.00%	0.00%	0.0000%	0.00%	1.34	0.67	0.00	0.00	0.00	0.00
Unit 15															
D. Topcoat	7.75	0.0030	1050	10.00%	0.00%	1.00%	2.00%	0.0000%	7.10%	10.69	0.00	1.07	2.14	0.00	7.59
Acid Catalyst	9.09	0.0005	1050	0.00%	0.00%	0.00%	0.00%	0.0000%	20.10%	0.00	0.00	0.00	0.00	0.00	4.20
Unit 21															
D. Topcoat	7.75	0.0030	1050	10.00%	0.00%	1.00%	2.00%	0.0000%	7.10%	10.69	0.00	1.07	2.14	0.00	7.59

Total State Potential Emissions: * **22.72** 0.67 3.38 4.28 7.55 19.38

METHODOLOGY

Total Combined HAPs: **57.98**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

The asterick denotes worst case single HAPs

In the original TV, the worst case single HAPs was xylene from the coating 711 stain, at a potential of 135.29 tons per year.

Due to adjustments in the weight percent for xylene in the 711 stain, when the potential emissions are added with the other coatings containing xylene, the potential emissions are 22.72 t/y. This is considerably less than what was calculated for the original TV.

Total combined HAPs from the original TV were calculated at 218.8 t/y.

Appendix A: Emissions Calculations **Automated Finishing Line Baghouse/Cyclone System**

page 3 of 4 tsd app A

Company Name: Middlebury Hardwoods Inc.
Address City IN Zip: 58481 State Road 13, Middlebury, Indiana 46540-1429
Permit: 039-12718-00245
Reviewer: Melissa Groch

Potential Emissions:

Original TV woodworking statistics

Before Controls:	After Controls:
55739.51 lbs/hr	5.75 lbs/hour

New equipment for Automated Finishing Line:

After Controls: 0.0010 lbs/hr

				Outlet grain loading			
Unit	Collector	ACFM	Throughput	gr/ascf	After Controls	Before Controls	Allowable
CE-07	Cyclone	5000	5 lbs/hr	0.0000067	0.00029 lbs/hr	0.0058 lbs/hr	(in series with baghouse)
CE-07	Baghouse	5000	5 lbs/hr	0.0000166	0.00071 lbs/hr	0.0142 lbs/hr	1.67
Total throughput of wood:			525 lbs/hr	After control emissions: (gr/acf)(acf/min)(60min/hr)(lb7000 gr)			
PM control equipment:			baghouse and cyclone				
Control efficiency:			95%	Before control emissions: (after control emissions in lbs/hr)/(1-control efficiency)			

Allowable Emissions

Wood throughput: (lbs wood/hr)(ton/2000lb)= P in tons per hour 0.2625

326 IAC 6-3-2 (Process Operations- Particulate emissions limitations)

E = 4.10P ^{0.67}	Where E= emissions in lbs/hr
E = 1.67	P= process weight rate in tons/hr

Since the PM emissions before controls is 0.001 pounds per hour, which is less than the PM allowable of 1.67 pounds per hour, the baghouse/cyclone system for the automated finishing line shows compliance with 326 IAC 6-3.

It is in the source's best interest to maintain the integrity of the baghouse/cyclone system so that PM does not affect the finish on the product being coated by the automated finishing line.

Therefore, this new system is considered integral to the process, and emissions are considered after controls.

Appendix A: Emissions Calculations
External Combustion Boiler - Commercial/Institutional
Wood Waste Combustion (wood-fired boiler, controlled)

Company Name: Middlebury Hardwoods Inc.
Address City IN Zip: 58481 State Road 13, Middlebury, Indiana 46540-1429
Permit: 039-12718-00245
Reviewer: Melissa Groch

BOILER B1

Capacity MMBtu/hr	Capacity tons/hr
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19.13	1.26
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Emission Factor in lb/ton	Pollutant							
	PM 8.8	PM controlled 8.8	PM10* 8.8	PM10 controlled 8.8	SO2 0.15	NOx 1.80	VOC 0.18	CO 6.6
Potential Emissions in tons/yr	48.5	6.3	48.5	6.3	0.8	9.9	1.0	36.4

* AP-42 does not contain a PM10 emission factor, therefore the PM10 emission factor is assumed to be equal to the PM emission factor

Methodology

This is the first boiler at the source.

The collection efficiency of the cyclone is 87%.

The AP-42 factors are based on wet, as-fired wood waste with an average moisture content of 50% and an average heating value of 4,500 Btu/lb.

Heating value of wood = 7600 Btu/lb, as submitted in the application

The source submitted higher values for SOx, NOx, and TOC than what was listed by AP-42. However, they would have to stack test in order to use them in the permit calculations. As a result, the source agreed to using the factors supplied by AP-42.

Capacity (tons/hr) = Heat Input Capacity (MMBtu/hr) x Heating Value of wood (1lb/7600 Btu) x (10⁶ Btu/MMBtu) x 1 ton/2000 lbs

Emission Factors are from AP-42 Chapter 1.6 (Supplement E, 2/99), SCC #1-01-009-03, 1-02-009-03, 1-02-009-06, 1-03-009-03

Emissions (tons/yr) = Capacity (tons/hr) x Emission Factor (lb/ton) x 8760hrs/yr x 1ton/2000lbs